

DECLARATION OF [REDACTED]

I, [REDACTED], make the following declaration based on my personal knowledge and declare under the penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is [REDACTED]. I am over the age of 18 and am competent to testify regarding the matters described below.
2. I am a citizen of Haiti. Before I was deported, I lived in Phoenix, Arizona.
3. I first arrived in the United States in 1992 when I was 14. I fled Haiti that year out of fear for my safety. My father worked for the former president of Haiti, and after the 1992 coup overthrowing this president, people shot up our house and kidnapped my father. That was the last time my brother or I saw him. My brother and I traveled on a boat to the United States to seek safety. The U.S. Coast Guard took us to Guantanamo Bay for questioning, and we entered the United States.
4. In November 2015, I won withholding of removal from Haiti. I was released from immigration detention on or around November 13, 2015.
5. After my release, I married my wife, [REDACTED], a U.S. citizen. We have 3 children.
6. The U.S. Department of Homeland Security detained me again on or around July 9, 2025, in a detention center in Florence.
7. After about three weeks in detention, U.S. Immigration and Customs Enforcement (ICE) agents took about 19 of us—about two Haitians and about 17 Cubans— from our beds around 2:30 AM to the immigration office across the street. They put us in a cage and called us up one by one to sign papers agreeing to deportation to Mexico. The paper I saw was in English, and it said that if I signed, I would be deported for 10 years. Some of the other detained people objected to signing the documents. A man who said he was a supervisor responded. I understood him to say that they would send us to Mexico anyway. An officer pulled me aside, and I told him that I did not want to sign the papers because I heard that there was a lot of crime with the cartels in Mexico. The officers deported about 7 of the Cubans who signed the deportation papers that day, and the rest of us went back to detention.
8. I continued to be detained after that. While there, based on advice my wife got from a lawyer, I requested an immigration custody review. A deportation officer sent me a packet to fill out for the immigration custody review. I filled out the packet, and my wife obtained documents for the packet. We submitted it on August 19. I never heard anything more about this request and never was interviewed about my fear of going to Mexico.

9. On or around September 5, 2025, around 4:30 PM, officers told me to pack my stuff up and that I was going to Louisiana. I was fingerprinted, and then officers took me and a number of other detained people to the immigration office across the street. We all stayed there overnight.
10. The next morning the officers handcuffed us, put us in van, and drove us to Nogales, Arizona. I knew then that we were going to Mexico, not Louisiana. After the van stopped, a U.S. officer started spraying us with pepper spray to make us leave the van. I was screaming, and officers grabbed me, dragged me out of the van, and pushed me into the Mexican officers' van. I was choking. I have asthma, and I couldn't breathe. Finally, a Mexican immigration officer located my inhaler, and I took several puffs, but I still couldn't breathe and then passed out. A man who had been detained with me started pumping my chest. He asked for medical for me, but I never got medical attention.
11. Mexican officers drove us to Tabasco, Mexico, where we were released. All I had with me was 5 U.S. dollars, my inhaler, eye drops for glaucoma, and the clothes I wore when I detained. Another deported person and I stayed in a hotel for several days. While we were there, three people were murdered on the hotel grounds. I felt extremely unsafe in Tabasco. If we went out, strangers told us we did not belong and to leave Mexico.
12. We then went to Cancún. There I met another Haitian man who warned me not to speak Creole because some Mexicans are looking for Haitian people to kill. I remain very afraid and constantly watch my surroundings.

I declare under penalty of perjury that the above information is true and correct to the best of my knowledge.

Executed on this 11th day of November 2025 at Cancún, Quintana Roo, Mexico.

[REDACTED]
[REDACTED]